

**EXHIBIT 84
FILED UNDER SEAL**

1 UNITED STATES DISTRICT COURT

2 NORTHERN DISTRICT OF CALIFORNIA

3 SAN FRANCISCO DIVISION

4

5 WAYMO LLC,)

6 Plaintiff,)

7 vs.) Case No.:

8 UBER TECHNOLOGIES, INC.,) 3:17-cv-00939-WHA

9 OTTOMOTTO LLC; OTTO TRUCKING)

10 LLC,)

11 Defendants.)

12)

13

14 CONFIDENTIAL - ATTORNEYS' EYES ONLY

15

16 VIDEOTAPED DEPOSITION OF MICHAEL LEBBY

17 San Francisco, California

18 Monday, April 17, 2017

19 Volume 1

20

21 Reported by:

22 RACHEL FERRIER, CSR No. 6948

23 Job No. 2596388

24

25 PAGES 1 - 80

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| 1 A That is correct. 01:44:38 | 1 a fashion where there is [REDACTED] of the boards 01:47:56 |
| 2 Q So that's not something you considered as part of 01:44:39 | 2 and [REDACTED] of the boards. 01:47:59 |
| 3 your declaration? 01:44:44 | 3 Q And that's the same for each cavity; correct? 01:48:02 |
| 4 A That is correct. I did not consider that. 01:44:45 | 4 A Yes. So for the long-range cavity, a similar 01:48:07 |
| 5 Q Turning to paragraph 30 of your declaration, 01:44:47 | 5 situation occurs where there are [REDACTED] lasers, and the 01:48:10 |
| 6 Exhibit 30, here your declaration is discussing -- 01:45:03 | 6 lasers are distributed. 01:48:14 |
| 7 discussing Waymo trade secrets that you characterize as 01:45:16 | 7 I believe, in this case, [REDACTED] 01:48:18 |
| 8 the "six-board arrangement"; is that fair? 01:45:19 | 8 [REDACTED] if I 01:48:22 |
| 9 A Yeah, in line 13, I characterize Waymo's 01:45:21 | 9 remember correctly. 01:48:27 |
| 10 system as [REDACTED] Yes, that's 01:45:27 | 10 Q So, again, the Fuji device, overall [REDACTED] total 01:48:27 |
| 11 correct. 01:45:30 | 11 lasers? 01:48:31 |
| 12 Q You understand that what you have characterized 01:45:30 | 12 A If you add the two cavities together, [REDACTED] lasers 01:48:32 |
| 13 as [REDACTED] covers two distinct trade 01:45:32 | 13 per cavity, the Fuji device has [REDACTED] lasers. 01:48:38 |
| 14 secrets from Waymo's trade secret list; correct? 01:45:35 | 14 Q You agree the design files for the transmit 01:48:42 |
| 15 A I've written on line 10, that covers created 01:45:38 | 15 boards in the Fuji system are labeled [REDACTED] 01:48:51 |
| 16 Secrets No. 2 and 3. 01:45:42 | 16 correct? 01:48:53 |
| 17 I believe that's the one you are talking about; 01:45:49 | 17 A Yeah. 01:48:53 |
| 18 right? 01:45:52 | 18 If you take the medium-range cavity, you will 01:48:57 |
| 19 Q Correct. 01:45:52 | 19 find that the -- the boards -- and I'm looking at 01:49:00 |
| 20 Is it your opinion that both Trade Secret Nos. 2 01:45:54 | 20 page 7, paragraph 25 of my declaration. You will see 01:49:04 |
| 21 and 3 are directed to [REDACTED] 01:45:56 | 21 boards labeled [REDACTED] for the medium-range cavity, 01:49:08 |
| 22 [REDACTED] 01:45:59 | 22 and they are labeled [REDACTED] for the long-range 01:49:11 |
| 23 [REDACTED] 01:46:02 | 23 cavity. 01:49:14 |
| 24 [REDACTED] 01:46:06 | 24 Q They are not labeled [REDACTED] and then [REDACTED] 01:49:14 |
| 25 A I don't recall exactly what's written in the 01:46:07 | 25 again; correct? 01:49:18 |

Page 34

Page 36

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| 1 Trade Secrets 2 or 3, but given that I've written it 01:46:09 | 1 A They are labeled [REDACTED] for medium range and [REDACTED], 01:49:19 |
| 2 down in my declaration, that's my understanding. 01:46:13 | 2 [REDACTED] for long-range. 01:49:23 |
| 3 Q You agree that the Fuji device has 64 laser 01:46:15 | 3 Q Okay. Other than the Fuji device, is the only 01:49:23 |
| 4 diodes on [REDACTED] transmit boards; is that fair? 01:46:29 | 4 other LiDAR device that you considered in connection 01:49:32 |
| 5 A The Fuji device is a different device. It has 01:46:33 | 5 with your declaration -- strike that. 01:49:35 |
| 6 [REDACTED] boards per cavity. It has two cavities. So the 01:46:37 | 6 Other than the Fuji device, is the only other 01:49:39 |
| 7 Fuji device is -- is different compared to the Waymo 01:46:41 | 7 LiDAR device with [REDACTED] that 01:49:42 |
| 8 device. [REDACTED]. Fuji is 01:46:45 | 8 you considered in connection with your declaration the 01:49:51 |
| 9 composed of two cavities, each cavity having [REDACTED] 01:46:49 | 9 Waymo GBR3 device? 01:49:53 |
| 10 boards. 01:46:53 | 10 MR. MUINO: Objection to the form of the 01:50:04 |
| 11 Q Looking at the Fuji device overall, you agree 01:46:53 | 11 question. 01:50:05 |
| 12 there's [REDACTED] transmit boards? 01:46:56 | 12 THE WITNESS: Could you restate the question a 01:50:06 |
| 13 A The Fuji device has [REDACTED] boards for medium-range 01:47:02 | 13 different way? 01:50:08 |
| 14 cavity and [REDACTED] boards for a long-range cavity. If you 01:47:09 | 14 MR. NEWTON: Sure. 01:50:09 |
| 15 want to sum the number of boards together, there are [REDACTED] 01:47:12 | 15 Q Other than GBR3 and the Fuji device, your 01:50:09 |
| 16 boards, but there are two cavities and has two different 01:47:16 | 16 declaration does not identify any other LiDAR systems 01:50:12 |
| 17 designs, and each cavity has [REDACTED] boards, so the way I 01:47:21 | 17 that [REDACTED] 01:50:14 |
| 18 look at this is [REDACTED] boards per cavity. 01:47:24 | 18 [REDACTED] 01:50:19 |
| 19 Q Each of those [REDACTED] boards has [REDACTED] laser 01:47:27 | 19 A I believe the answer is correct. I didn't see 01:50:20 |
| 20 diodes; correct, in the Fuji device? 01:47:35 | 20 other [REDACTED]-channel units that had [REDACTED] 01:50:22 |
| 21 A The Fuji device, if you are talking about one 01:47:37 | 21 [REDACTED]. 01:50:28 |
| 22 cavity, one cavity -- let's take the medium-range cavity 01:47:43 | 22 Q If you look at paragraph 31, the Velodyne HDL 64 01:50:32 |
| 23 has [REDACTED] boards. On the [REDACTED] boards, we have a total 01:47:48 | 23 LiDAR system, this is one of the ones you considered as 01:50:37 |
| 24 of [REDACTED] lasers. 01:47:50 | 24 part of your declaration? 01:50:40 |
| 25 My understanding is the lasers are distributed in 01:47:52 | 25 A It is my understanding that the Velodyne has 64 01:50:41 |

Page 35

Page 37

10 (Pages 34 - 37)

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| 1 channels -- or let's say it's 64 lasers. 01:50:52 | 1 PCBs was limited by well-known design considerations for 01:53:59 |
| 2 Q And in the Velodyne system, each of those 64 01:50:58 | 2 automotive LiDARs 01:54:00 |
| 3 lasers is on its own transmit PCB; is that correct? 01:51:04 | 3 Do you see that? 01:54:01 |
| 4 A I don't know the actual layout of the Velodyne 01:51:07 | 4 A I do see that 01:54:02 |
| 5 system other than what I've seen in the '190 patent, 01:51:11 | 5 Q Do you know when Waymo first decided to develop a 01:54:03 |
| 6 which is the Velodyne patent, and -- in the '190 patent, 01:51:15 | 6 64-laser LiDAR system? 01:54:07 |
| 7 there are 32 transmit boards and 32 receive boards. The 01:51:19 | 7 A It may have been in some of the documents I've 01:54:08 |
| 8 patent discusses one laser per board, but it also 01:51:27 | 8 read, but I don't recall any dates to give you an answer 01:54:27 |
| 9 discusses a potential for two lasers per board, so I 01:51:30 | 9 to that question 01:54:30 |
| 10 don't know if the '190 patent is related to the HDL 64 01:51:33 | 10 Q Does [REDACTED] sound approximately right? 01:54:31 |
| 11 or not. 01:51:37 | 11 A I probably need to look at the documents I 01:54:35 |
| 12 Q Okay. Fair enough. 01:51:37 | 12 don't recall that level of detail 01:54:40 |
| 13 You agree that one possible arrangement of the 01:51:41 | 13 Q Okay So assuming it would be [REDACTED] what 01:54:41 |
| 14 LiDAR device with 64 lasers is one laser per board? 01:51:44 | 14 I want to get at is that your declaration mentions 01:54:49 |
| 15 A Yeah. Hypothetically, yes, you could have 64 01:51:48 | 15 this -- this point where Waymo had decided to develop a 01:54:52 |
| 16 lasers, each having one laser per board. Yes, that is 01:51:51 | 16 64-laser LiDAR; is that correct? 01:54:55 |
| 17 one hypothetical situation. 01:51:56 | 17 A I certainly mentioned, on line 24 on page 8, that 01:54:57 |
| 18 Q And another one would be 21 or 22 laser diodes on 01:51:58 | 18 Waymo decided to develop a 64-laser LiDAR, yes 01:55:04 |
| 19 three boards? 01:52:03 | 19 Q Okay And regardless of whether that was [REDACTED] 01:55:07 |
| 20 A Yeah. That is another configuration that is 01:52:04 | 20 [REDACTED], or another time, your declaration doesn't cite any 01:55:12 |
| 21 possible too, yes. 01:52:15 | 21 independent evidence to show that there were well-known 01:55:16 |
| 22 Q Another configuration is 16 laser diodes on four 01:52:16 | 22 design considerations for automotive LiDARs at that 01:55:18 |
| 23 boards? 01:52:21 | 23 time; is that fair? 01:55:21 |
| 24 A Yeah. There is -- there are a number of 01:52:24 | 24 A Well, considerations for LiDARs are -- as far as 01:55:23 |
| 25 different ways you can break up 64 lasers. As you say, 01:52:30 | 25 I can tell, from reading the documents I've seen, you 01:55:33 |
| Page 38 | Page 40 |
| 1 you could have 64 lasers on 64 boards at one extreme, 01:52:35 | 1 know, one of the industry-leading LiDARs at the time was 01:55:38 |
| 2 and the other extreme, you could have one board with 64 01:52:39 | 2 the Velodyne, and the Velodyne, as we said earlier, had 01:55:40 |
| 3 lasers on it. 01:52:42 | 3 one laser per board The '190 patent shows 32 boards on 01:55:44 |
| 4 Both of those situations are, from my standpoint, 01:52:43 | 4 one side for the laser and 32 boards on the other side 01:55:50 |
| 5 problematic from an engineering perspective, and there 01:52:49 | 5 for the photodetector It's my understanding that the 01:55:53 |
| 6 are certainly other configurations that you just 01:52:52 | 6 alignment of the boards was actually difficult and 01:55:55 |
| 7 mentioned. 01:52:55 | 7 time-consuming 01:55:59 |
| 8 Q Would you agree that an eight-by-eight 01:52:55 | 8 And so I don't know the details of the design 01:56:00 |
| 9 arrangement would be less problematic from an 01:52:57 | 9 team's work here, but certainly from my perspective, you 01:56:05 |
| 10 engineering standpoint? 01:53:00 | 10 would want to look for easier ways to align the 01:56:09 |
| 11 A I haven't seen all the engineering parameters. 01:53:01 | 11 channels 01:56:12 |
| 12 You know, when you are designing an engineering 01:53:08 | 12 Q Okay And you didn't cite the Velodyne patent as 01:56:13 |
| 13 system, it's not just the number of boards or the optics 01:53:10 | 13 a specific example of a well-known design consideration 01:56:20 |
| 14 or the lasers or the photodetectors. You have to look 01:53:13 | 14 for automotive LiDAR? 01:56:24 |
| 15 at the cost of the unit, and you have to look at the 01:53:16 | 15 A It's not cited in paragraph 32, but I believe it 01:56:25 |
| 16 size considerations, and you also have to look at things 01:53:18 | 16 may be cited elsewhere I've actually cited it in 01:56:29 |
| 17 like thermal loaded, as well as yield of the lasers once 01:53:22 | 17 paragraph 38 So the patent has been cited in my 01:56:41 |
| 18 you put them down onto the boards. 01:53:28 | 18 declaration 01:56:47 |
| 19 These engineering considerations have to be taken 01:53:30 | 19 Q Right 01:56:47 |
| 20 into effect, and I don't believe I've been exposed to 01:53:33 | 20 But not cited to say that here's an example of a 01:56:48 |
| 21 all those details at this time. 01:53:36 | 21 well-known design consideration for automotive LiDARs; 01:56:53 |
| 22 Q Okay. In paragraph 32 of your declaration, you 01:53:39 | 22 is that fair? 01:56:57 |
| 23 say: Once Waymo had decided to develop a 64-laser 01:53:44 | 23 A Yeah, I think that's probably a fair comment, 01:56:58 |
| 24 LiDAR, its range of choices for how many transmit PCBs 01:53:49 | 24 looking at what I've written in paragraph 32 I do not 01:57:14 |
| 25 to use and how to distribute the laser diodes across the 01:53:53 | 25 go into details about well-known design considerations 01:57:22 |
| Page 39 | Page 41 |

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| 1 not be ideal for automotive LiDARs due to size 02:05:07 | 1 Q You have to account for with more boards? 02:08:01 |
| 2 considerations; correct? 02:05:11 | 2 A Well, physical alignment, and will the boards 02:08:03 |
| 3 A Size considerations is one of the issues if you 02:05:11 | 3 stay in alignment over the course of a lifetime of the 02:08:07 |
| 4 had 64 lasers on a board, but the other thing you would 02:05:16 | 4 LiDAR 02:08:10 |
| 5 have to be careful of is these laser are high-power 02:05:21 | 5 Q So in terms of the alignment, both physical and 02:08:10 |
| 6 lasers, and so there's going to be thermal effects, and 02:05:25 | 6 optical, more boards probably means more complexity? 02:08:13 |
| 7 the thermal effects will translate into board warpage, 02:05:28 | 7 A Well, the way I would look at this is if you have 02:08:18 |
| 8 and if the board warps, then everything goes out of 02:05:33 | 8 more boards, then your testing and alignment costs are 02:08:21 |
| 9 alignment, so not only is it a size issue, it's a 02:05:36 | 9 going to go higher If you have one board, your 02:08:26 |
| 10 thermal issue and, I would say, may even be a 02:05:38 | 10 alignment cost is going to go down, but then you have 02:08:29 |
| 11 manufacturing yield issue, because you are going to get 02:05:41 | 11 the problem of large size thermal loading and warpage of 02:08:32 |
| 12 64 lasers dye bonded to the board all perfectly, and 02:05:45 | 12 the board to go out of alignment 02:08:38 |
| 13 there is, you know, reasonable chance that one of them 02:05:49 | 13 So in both extremes, from an engineering 02:08:40 |
| 14 may not yield right, and that would add cost to the 02:05:51 | 14 standpoint, you may run into problems 02:08:43 |
| 15 board for rework. 02:05:55 | 15 Q Okay 02:08:45 |
| 16 Q Okay. So focusing just on size -- and that's 02:05:56 | 16 A Is it possible to take a break? 02:08:49 |
| 17 what I believe paragraph 33 of your declaration 02:06:10 | 17 Q Absolutely 02:08:51 |
| 18 addresses; right? I know you go on to mention thermal 02:06:14 | 18 THE VIDEOGRAPHER: It is 2:08 We are going off 02:08:52 |
| 19 considerations, but just looking at 33, you are talking 02:06:18 | 19 the record 02:08:55 |
| 20 about size? 02:06:20 | 20 (Recess taken) 02:08:55 |
| 21 A Yes -- well, I discuss in paragraph 33 -- size is 02:06:20 | 21 THE VIDEOGRAPHER: We are back on the record 02:19:55 |
| 22 certainly one of the parameters that has to be taken 02:06:29 | 22 It's 2:20 02:20:06 |
| 23 into account to design, let's call it, efficient LiDAR 02:06:31 | 23 BY MR. NEWTON: 02:20:08 |
| 24 systems. 02:06:37 | 24 Q Dr Lebby, you also offered an opinion in 02:20:13 |
| 25 Q You say that use of larger PCB with numerous 02:06:38 | 25 paragraph 35 of your declaration that it is important to 02:20:16 |
| Page 46 | Page 48 |
| 1 laser diodes would necessitate a larger LiDAR housing; 02:06:40 | 1 have an equal or approximately equal number of laser 02:20:18 |
| 2 is that right? 02:06:44 | 2 diodes per PCB to ensure an even thermal load 02:20:19 |
| 3 A Well, yes, if you had larger boards, then the 02:06:44 | 3 across the PCBs; is that correct? 02:20:24 |
| 4 housing most likely would have to be bigger, but I can't 02:06:48 | 4 A Yes. 02:20:26 |
| 5 comment on that because I haven't really designed the 02:06:56 | 5 In paragraph 35, I'm indicating -- agreeing with 02:20:32 |
| 6 housing, and maybe there's some innovative way to -- 02:06:58 | 6 what Mr. Kits was saying in his declaration of making 02:20:35 |
| 7 to -- to deal with larger boards, but, generally 02:07:02 | 7 sure that you have an equal or uniform thermal load. 02:20:40 |
| 8 speaking, size would be an issue. 02:07:05 | 8 Q Is it fair to say that all -- 02:20:43 |
| 9 Q Is it fair, though, that if you had the same 02:07:08 | 9 (Discussion off the stenographic record.) 02:20:43 |
| 10 number of lasers and you wanted to put them on smaller 02:07:12 | 10 MR. NEWTON: I'll start over. 02:20:56 |
| 11 boards, you would need more boards? 02:07:15 | 11 Q All else being equal, is it fair to say that an 02:20:57 |
| 12 A Same number of lasers on smaller boards need more 02:07:18 | 12 eight-by-eight arrangement of laser diodes would have a 02:20:59 |
| 13 boards. So, yeah, that's -- hypothetically, you could 02:07:23 | 13 more even thermal load than a [REDACTED] 02:21:04 |
| 14 have 64 lasers on one board on one extreme. On the 02:07:26 | 14 arrangement of laser diodes? 02:21:06 |
| 15 other extreme, you could have 64 boards with each having 02:07:29 | 15 A I don't know the detailed answer to that question 02:21:07 |
| 16 one laser. 02:07:32 | 16 because I haven't looked at the engineering 02:21:13 |
| 17 Q So when you add more boards, your size is going 02:07:33 | 17 specifications for everything. 02:21:15 |
| 18 to increase in some dimension; fair? 02:07:36 | 18 Certainly we have to take into account the size 02:21:19 |
| 19 A Yeah, your -- if you have got 64 boards, yes, you 02:07:38 | 19 that is being allowed in the LiDAR to position all the 02:21:24 |
| 20 may have a size issue, but you also have -- probably 02:07:42 | 20 boards. I'm not clear -- it's not clear to me that 02:21:28 |
| 21 have a difficult alignment issue. Now you are aligning 02:07:45 | 21 there may be space for eight boards. I don't know the 02:21:30 |
| 22 64 boards as opposed to one board. That's optical 02:07:48 | 22 actual space -- the space availability in these designs, 02:21:34 |
| 23 alignment. 02:07:53 | 23 but what is really important is to make sure that you 02:21:42 |
| 24 Q And there's also a physical alignment; correct? 02:07:54 | 24 can fit the boards in a reasonable size. You can 02:21:45 |
| 25 A Well, you have got -- 02:07:57 | 25 make sure that the design is what I would term is 02:21:52 |
| Page 47 | Page 49 |

13 (Pages 46 - 49)

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| 1 scalable, which means you can scale it in cost, so you 02:21:55 | 1 applications. It just talks about the technology that 02:24:19 |
| 2 don't actually increase the cost, but you can reduce the 02:21:59 | 2 is used in terms of packaging semiconductor lasers. 02:24:24 |
| 3 cost. You can maintain alignment, for example, and 02:22:01 | 3 Q And you -- I'm looking at paragraph 37 of your 02:24:27 |
| 4 that's making sure you have a thermal load. 02:22:04 | 4 declaration, which you might want to follow along with. 02:24:33 |
| 5 So whether that's eight or six or seven and a 02:22:07 | 5 You specifically cite Figure 5.5 of the Liu 02:24:37 |
| 6 half or five and a half, I don't know that answer, but I 02:22:10 | 6 textbook; correct? 02:24:44 |
| 7 think it's important to take into account that you want 02:22:13 | 7 A Yes, I have cited that figure. 02:24:45 |
| 8 to try and minimize your thermal load issues and your 02:22:15 | 8 Q Okay. And this shows a semiconductor laser stack 02:24:47 |
| 9 size issues when you come to your design. 02:22:20 | 9 that is composed of multisemiconductor laser bars 02:24:51 |
| 10 Q Okay. I'll just ask you, since we are on a clock 02:22:22 | 10 arranged vertically? 02:24:54 |
| 11 here and we have a limited amount of time, if you could 02:22:29 | 11 A That is correct; although, I would note, on 02:24:58 |
| 12 try to answer my questions specifically. If you can't, 02:22:32 | 12 line 22 of page 9, I do not call out a laser stack of 02:25:02 |
| 13 of course, I understand. 02:22:34 | 13 bars, but I use the word three "boards," but I believe 02:25:07 |
| 14 But just so we are clear, my question was: All 02:22:35 | 14 that you are probably more correct. 02:25:12 |
| 15 else being equal, an eight-by-eight arrangement of laser 02:22:38 | 15 Q Okay. "Boards" was your term, not the term from 02:25:14 |
| 16 diodes would have a more even thermal diode than a 02:22:41 | 16 the Liu textbook? 02:25:17 |
| 17 [REDACTED] arrangement, and with the 02:22:45 | 17 A "Board" was my term. 02:25:19 |
| 18 information, you can't give a "yes" or "no" answer to 02:22:49 | 18 Q Okay. And laser bars, am I correct that they are 02:25:21 |
| 19 that; is that fair? 02:22:52 | 19 strips of multiple emitters on a common heat sink that 02:25:26 |
| 20 A I can't give an answer because I don't have the 02:22:53 | 20 are all packaged together? 02:25:31 |
| 21 details. 02:22:57 | 21 A Yeah. Laser bar is -- is a single piece of 02:25:32 |
| 22 When you say "everything being equal," I don't 02:22:59 | 22 semiconductor. 02:25:35 |
| 23 know what "everything" is, so I can't really give you a 02:23:01 | 23 In this case, the laser bars are showing ten -- 02:25:36 |
| 24 categorical answer there. 02:23:05 | 24 ten emitters, and it would probably have ten stripes, 02:25:40 |
| 25 // 02:23:05 | 25 and they are not singulated, so they are not individual 02:25:43 |

Page 50

Page 52

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| 1 (Exhibit 33 was marked for 02:23:05 | 1 lasers. 02:25:46 |
| 2 identification by the Court Reporter.) 02:23:05 | 2 Q And the LiDAR systems that we have talked about 02:25:47 |
| 3 BY MR. NEWTON: 02:23:05 | 3 in this case use singulated emitters; correct? 02:25:50 |
| 4 Q Okay. I've handed you Exhibit No. 33, and this 02:23:06 | 4 A Yes. They use singulated emitters. 02:25:55 |
| 5 was Exhibit 4 to your declaration. It's a textbook 02:23:15 | 5 I think I saw, in one of the documents, that the 02:26:00 |
| 6 authored by Xingsheng Liu; is that correct? 02:23:18 | 6 emitter is composed of [REDACTED] laser-emitting chips. I 02:26:05 |
| 7 And I should mention this is an excerpt from the 02:23:22 | 7 haven't seen, in detail, what they look like, but this 02:26:11 |
| 8 textbook. 02:23:25 | 8 example here just shows you that you could have a laser 02:26:14 |
| 9 A Yes, it is. 02:23:25 | 9 bar with ten laser diode outputs. 02:26:17 |
| 10 Q The title of the textbook is "Packaging of High 02:23:26 | 10 Q You agree with me that Figure 5 is -- is it fair 02:26:20 |
| 11 Power Semiconductor Lasers"? 02:23:29 | 11 to say it's kind of a crude representation of the laser 02:26:38 |
| 12 A That is correct. 02:23:30 | 12 stack -- laser bar stack? 02:26:41 |
| 13 Q What does "packaging" refer to in that title? 02:23:31 | 13 A When you say "crude," yeah, there's not a lot of 02:26:42 |
| 14 A "Packaging" is usually the process of making 02:23:38 | 14 details in Figure 5.5. It just shows three substrates 02:26:48 |
| 15 outside connections to a semiconductor chip. It doesn't 02:23:43 | 15 mounted on top of each other with laser bars mounted on 02:26:52 |
| 16 have to be a semiconductor chip, but it's usually 02:23:51 | 16 the substrate and the -- what would look like the 02:26:55 |
| 17 something that emits or detects light in this case. 02:23:53 | 17 emitted laser beam from each of the output emitters. 02:26:59 |
| 18 Packaging usually allows both optical and electrical 02:23:56 | 18 Q And do you agree that the number of emitters on a 02:27:03 |
| 19 connections to the outside world. 02:23:59 | 19 semiconductor laser bar range from 19 to 69, typically? 02:27:06 |
| 20 Q Okay. And this textbook is not specific to 02:24:01 | 20 A The number of emitters on a laser bar range from 02:27:12 |
| 21 LiDAR; is that correct? 02:24:03 | 21 19 to 69. I'm not sure I understand the question. 02:27:24 |
| 22 A That is correct. 02:24:04 | 22 Q So a laser bar typically has a number of laser 02:27:27 |
| 23 Q And the textbook does not describe any specific 02:24:05 | 23 emitters on it; correct? 02:27:32 |
| 24 LiDAR applications; is that correct? 02:24:11 | 24 A Yes. 02:27:34 |
| 25 A I don't believe the textbook discusses LiDAR 02:24:12 | 25 Q Not just one, but multiple? 02:27:35 |

Page 51

Page 53

14 (Pages 50 - 53)

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| 1 [REDACTED] ? 02:34:10 | 1 A Oh, Figure 7.51 [sic]? 02:37:28 |
| 2 A I see that. 02:34:12 | 2 Q Yes. 02:37:30 |
| 3 Q Am I correct that you do not dispute that the 02:34:13 | 3 A Yes, I've got that in front of me. 02:37:31 |
| 4 Fuji device includes a transmit block with a plurality 02:34:18 | 4 Q And Liu also includes a Figure 7.5.0? 02:37:33 |
| 5 of laser diodes mounted on [REDACTED] with [REDACTED] 02:34:21 | 5 A That is correct. 02:37:36 |
| 6 [REDACTED] 02:34:27 | 6 Q And that's not cited in your declaration? I 02:37:37 |
| 7 A So I have heard this from Mr. Haslim in my 02:34:30 | 7 should say, the figure itself is not included in your 02:37:47 |
| 8 video-call discussion with him, because I asked him the 02:34:37 | 8 declaration? 02:37:49 |
| 9 question, though I have not actually seen a board or a 02:34:39 | 9 A Yeah, I think I just cited the Liu textbook 02:37:49 |
| 10 laser package in -- in real life, only from a 02:34:42 | 10 page 224. 02:37:53 |
| 11 photograph, which I've used in my document, and the 02:34:47 | 11 Q You don't discuss Figure 7.5.0 in your 02:37:54 |
| 12 resolution of which is -- doesn't allow me to take a 02:34:50 | 12 declaration? 02:37:57 |
| 13 close look at the situation. 02:34:53 | 13 A That is correct. 02:37:57 |
| 14 Q So you did not offer an opinion as to whether 02:34:54 | 14 Q And figure -- page 224 of the Liu textbook, along 02:38:01 |
| 15 this design is present or not in the Fuji device? 02:34:58 | 15 with Figure 7.5.0 and 7.5.1, this material is not in the 02:38:13 |
| 16 A It's my understanding that the laser diodes used 02:35:02 | 16 context of LiDAR; correct? 02:38:19 |
| 17 in the Fuji system are [REDACTED], from my discussion with 02:35:08 | 17 A Well, what we are looking at here is the 02:38:20 |
| 18 Mr. Haslim. 02:35:12 | 18 placement of laser diodes. 02:38:26 |
| 19 Q Did he tell you [REDACTED]? 02:35:12 | 19 Q So my question, Dr. Lebby, was just: Is it in 02:38:28 |
| 20 A I believe he may have said [REDACTED] but 02:35:14 | 20 the context of LiDAR specifically? 02:38:31 |
| 21 I can't be quoted on that because that number did come 02:35:22 | 21 A Well, this is in the context of packaging laser 02:38:33 |
| 22 up, and I wasn't sure if it related to [REDACTED] 02:35:26 | 22 diodes in high-power environment, and LiDAR uses 02:38:37 |
| 23 [REDACTED] 02:35:30 | 23 high-power laser diodes, so I would agree with you that 02:38:41 |
| 24 Q Is it correct that the only LiDAR devices with 02:35:33 | 24 LiDAR is not noted in the book, but I have to observe 02:38:46 |
| 25 [REDACTED] that are identified in your 02:35:37 | 25 that LiDAR uses high-power laser diodes in a similar 02:38:50 |
| | Page 60 |
| 1 declaration are Waymo's devices and the Uber Fuji 02:35:40 | 1 fashion. 02:38:54 |
| 2 device? 02:35:44 | 2 Q So page 224 of the Liu textbook, you would agree, 02:38:55 |
| 3 A Well, I haven't done a industrial review of LiDAR 02:35:44 | 3 is not discussing LiDAR specifically; is that fair? 02:39:02 |
| 4 devices, so what I can say is that, from the documents 02:35:52 | 4 A Well, it's -- it's discussing -- it's discussing 02:39:05 |
| 5 I've read, the Waymo device uses [REDACTED], and on 02:35:57 | 5 the packaging of high-power semiconductor lasers are 02:39:09 |
| 6 the Fuji device, from what I've been told -- and I 02:36:03 | 6 used in LiDAR, but it does not, agree with you, call out 02:39:12 |
| 7 haven't actually seen the board in detail -- that Fuji 02:36:06 | 7 LiDAR specifically. 02:39:17 |
| 8 device also uses [REDACTED] diodes. I don't know if any 02:36:09 | 8 Q It doesn't say use these designs in a LiDAR 02:39:17 |
| 9 other laser -- LiDAR unit uses [REDACTED] at this 02:36:13 | 9 system? 02:39:20 |
| 10 point. 02:36:18 | 10 A This book -- the context of this book is -- is 02:39:20 |
| 11 Q So you didn't identify any others besides the 02:36:18 | 11 the packaging of the lasers, not the applications, so I 02:39:24 |
| 12 Waymo and Fuji device in your declaration? 02:36:21 | 12 would agree with you that LiDAR is not called out or 02:39:28 |
| 13 A I didn't identify any others because I haven't 02:36:22 | 13 mentioned. 02:39:30 |
| 14 done analysis. 02:36:27 | 14 Q And I believe you say that a known disadvantage 02:39:31 |
| 15 Q Paragraph 49 of your declaration, you cite the 02:36:28 | 15 of [REDACTED] is an effective heat 02:39:36 |
| 16 Liu textbook again; is that correct? 02:36:37 | 16 conduction; correct? 02:39:41 |
| 17 A Yes. 02:36:39 | 17 A That is correct. 02:39:41 |
| 18 Q Okay. And I believe you cite page 224 of the Liu 02:36:41 | 18 Q And you agree with me that heat conduction and 02:39:42 |
| 19 textbook? 02:36:57 | 19 other thermal considerations are important for 02:39:46 |
| 20 A Yes, I have it in front of me. 02:36:58 | 20 high-powered laser diode applications? 02:39:48 |
| 21 Q And your declaration at paragraph 49 includes 02:37:00 | 21 A I would go further to say that heat conduction is 02:39:50 |
| 22 Figure 7.5.1 from Liu; correct? 02:37:09 | 22 important for all semiconductor diode lasers. 02:39:54 |
| 23 A Could you tell me where you get 7.5.1? 02:37:12 | 23 Q And then the -- I believe you also said the 02:39:56 |
| 24 Q You might have to cross-reference it with the -- 02:37:22 | 24 downside of underhanging laser diodes is potential 02:40:00 |
| 25 the Liu text itself. 02:37:25 | 25 blockage of emitted light? 02:40:03 |
| | Page 61 |

16 (Pages 58 - 61)

1 A If I remember correctly, my understanding of the 02:46:37
2 trade secret is [REDACTED] 02:46:41
3 [REDACTED] 02:46:45
4 [REDACTED] 02:46:50
5 Q So it's your understanding of the trade secret 02:46:54
6 [REDACTED] 02:46:56
7 [REDACTED] 02:47:01
8 [REDACTED] 02:47:06
9 A No. No. That's not exactly what I'm trying to 02:47:08
10 say. 02:47:11
11 What I'm trying to say is you have two parts to 02:47:11
12 this trade secret, is the best of my understanding. The 02:47:14
13 first part is [REDACTED] 02:47:17
14 [REDACTED] is 02:47:23
15 the first part. And the second part is -- [REDACTED] 02:47:28
16 [REDACTED] 02:47:33
17 [REDACTED]. 02:47:36
18 Q And do you agree that the trade secret also 02:47:36
19 includes the [REDACTED] 02:47:39
20 A I'm not sure I understand that -- that question, 02:47:42
21 other than the fact that [REDACTED] 02:47:57
22 [REDACTED] 02:48:01
23 [REDACTED] 02:48:05
24 [REDACTED] 02:48:09
25 [REDACTED] 02:48:14

Page 66

1 note, that I did not cite in my report because I 02:49:53
2 forgot -- let's see. The -- from line -- column 3, 02:49:57
3 line 10 to 16 talks about the alignment of photodiodes 02:50:05
4 towards the hole. I can read it if you wish. 02:50:11
5 Q No, that's okay. 02:50:13
6 Did you understand my question? 02:50:14
7 A Well, your question is, is the patent is -- 02:50:17
8 teaches [REDACTED] and what I'm 02:50:20
9 suggesting is that the patent, if you look at column 3, 02:50:23
10 actually does more than that. It actually teaches the 02:50:26
11 [REDACTED] 02:50:30
12 [REDACTED] 02:50:35
13 [REDACTED] 02:50:38
14 MR. NEWTON: I'll move to strike that response as 02:50:41
15 nonresponsive and outside the scope of your declaration. 02:50:44
16 Q My question was simply that this patent does not 02:50:47
17 deal with [REDACTED] 02:50:51
18 [REDACTED]. It's just a single printed circuit board; 02:50:53
19 correct? 02:50:56
20 A I believe there are two boards that are aligned 02:50:56
21 together here, and I believe that this patent teaches 02:51:00
22 the alignment of photodiodes to the board using the pin 02:51:05
23 as the source. 02:51:08
24 MR. NEWTON: Okay. I'll move to strike that as 02:51:11
25 well. 02:51:13

Page 68

1 Q Okay. In paragraph 53, you say: The concept of 02:48:14
2 [REDACTED] has been 02:48:22
3 known to the public since at least the 1970s, and you 02:48:24
4 cite U.S. Patent No. 4,244,109? 02:48:28
5 A Yes, I do. 02:48:33
6 Q I've marked that patent as Exhibit No. 35, which 02:48:33
7 is in front of you. 02:48:38
8 (Exhibit 35 was marked for 02:48:40
9 identification by the Court Reporter.) 02:48:49
10 BY MR. NEWTON: 02:48:49
11 Q And the '109 patent is directed to a read/write 02:48:51
12 head and a magnetic disk data storage system. 02:48:57
13 Does that sound correct? 02:49:01
14 A Yes. In the "Background of the Invention," the 02:49:02
15 '109 patent does talk about that as the application. 02:49:04
16 Q So it's not in the field of LiDAR? 02:49:07
17 A I would agree that the patent is written towards 02:49:12
18 optical storage. 02:49:15
19 Q And the '109 patent does not deal with [REDACTED] 02:49:16
20 [REDACTED] correct? 02:49:25
21 A If you look at the sections I've cited in 02:49:26
22 column 1 -- 189, that talks about the aligning of the 02:49:32
23 printed circuit board, and 163 talks about having a 02:49:38
24 cylindrical pin for the alignment. 02:49:47
25 But if you also look at column 3, which, I might 02:49:50

Page 67

1 Q If you look at Figure 3, that shows just a single 02:51:13
2 printed circuit board; correct, labeled 10? 02:51:16
3 A Figure 3 shows a number of things here. 02:51:23
4 No. 10 -- 02:51:46
5 Q Dr. Lebby, I'm sorry, just, again, in the 02:51:46
6 interest of time, if you could answer my question as 02:51:49
7 I've asked it, and I don't think the question was 02:51:51
8 complicated. 02:51:54
9 I just said, if you look at Figure 3, it shows a 02:51:54
10 single printed circuit board labeled No. 10; correct? 02:51:57
11 A Figure 3 shows a printed circuit board 10, plus a 02:51:59
12 alignment of a plate, which is aligned to the printed 02:52:04
13 circuit board, which I'm looking for the number and I 02:52:07
14 can't find it. 02:52:09
15 Q Okay. So you agree that Figure 3 shows only one 02:52:10
16 printed circuit board, "yes" or "no"? 02:52:13
17 A Let me just check what No. 14 is. 02:52:17
18 It certainly looks like Figure 3 has one printed 02:52:35
19 circuit board labeled 10. 02:52:38
20 Q And paragraph 53 of your declaration does not 02:52:39
21 describe more than one printed circuit board; correct? 02:52:52
22 A Paragraph 53 discusses the concept of using holes 02:52:55
23 to align printed circuit boards, and I've just given you 02:53:05
24 one patent, which is patent '109, that shows that you 02:53:07
25 can align components on a printed circuit board that's 02:53:12

Page 69

18 (Pages 66 - 69)

1 actually sourced to a pin to do it -- to align the board 02:53:14
2 to a glass plate, and there was a glass plate and a 02:53:17
3 board, and the components were all aligned based to the 02:53:23
4 pin. 02:53:25
5 Q Okay. So in your description of the '109 patent 02:53:25
6 in paragraph 53, you only mention the one PCB that's 02:53:28
7 disclosed in that patent; correct? 02:53:31
8 A Yes, that's correct. 02:53:32
9 Q And paragraph 54 of your declaration cites a 02:53:51
10 German patent from 1980? 02:53:55
11 A That is correct. 02:53:58
12 Q It's actually a patent application; correct? 02:53:59
13 A I take it that's Exhibit 36? 02:54:05
14 Q That's correct. Exhibit 36 was Exhibit 7 to your 02:54:13
15 declaration, I believe. 02:54:18
16 (Exhibit 36 was marked for 02:54:20
17 identification by the Court Reporter.) 02:54:21
18 THE WITNESS: I'm not sure if it's patent 02:54:21
19 application or not, but certainly it's a German patent, 02:54:25
20 and I've cited the abstract of this patent. 02:54:30
21 BY MR. NEWTON: 02:54:32
22 Q And the version of it that you have attached to 02:54:37
23 your declaration is -- looks like an English 02:54:39
24 translation; correct? 02:54:41
25 A Yes, I believe there's English and German. 02:54:42

Page 70

1 abstract to say that [REDACTED] 02:56:22
2 [REDACTED] 02:56:25
3 A Well, you talk about [REDACTED] 02:56:26
4 [REDACTED] 02:56:29
5 [REDACTED] 02:56:33
6 Q So it's your opinion that this patent discloses 02:56:34
7 [REDACTED] 02:56:38
8 [REDACTED] 02:56:42
9 [REDACTED] 02:56:44
10 A It's my understanding this patent teaches that 02:56:44
11 [REDACTED] 02:56:49
12 [REDACTED] 02:56:51
13 Q And that's the -- 02:56:54
14 A I believe the patent doesn't talk about the stack 02:56:55
15 per se, but it talks about the process of putting a 02:57:00
16 reference hole or an accurately located hole into 02:57:03
17 printed board so that [REDACTED] 02:57:06
18 [REDACTED] 02:57:09
19 Q Okay. And, again, you didn't cite the figures 02:57:09
20 from this patent as part of your declaration? 02:57:13
21 A I didn't cite the figures because I haven't seen 02:57:16
22 the figures and I couldn't find the figures. 02:57:18
23 Q You looked for them? 02:57:20
24 A I tried. 02:57:21
25 Q And it's not your opinion that this German patent 02:57:22
Page 72

1 Q Doesn't have any figures in it, does it? 02:54:45
2 A That is correct. 02:54:47
3 Q And in paragraph 54, you describe the German 02:54:48
4 patent as describing board holes that all have an exact 02:55:00
5 relative position to one another; correct? 02:55:05
6 A Correct. 02:55:07
7 Q And the board holes are not [REDACTED] 02:55:08
8 [REDACTED] correct? 02:55:15
9 A That I'm not sure about, because the abstract 02:55:16
10 talks about boards in a stack, so I would presume that 02:55:25
11 these are boards aligned in a stack using a reference 02:55:29
12 hole to align those boards. 02:55:33
13 Q But the abstract also discusses the board holes 02:55:34
14 as being positioned over a salter boss [phonetic]; 02:55:38
15 correct? 02:55:42
16 A That is correct. 02:55:42
17 Q So if each hole is positioned over a salter boss, 02:55:53
18 then the holes are not going to be positioned over each 02:56:03
19 other? 02:56:06
20 A Well, the design of the patent is to certainly 02:56:06
21 make holes in the printed circuit board so they could be 02:56:08
22 used in a stack minus, then, in a stack is a stack of 02:56:11
23 printed circuit boards that are aligned to the holes. 02:56:16
24 Q Right. 02:56:18
25 But there's not enough description in that 02:56:19

Page 71

1 is in the field of LiDAR; correct? 02:57:31
2 A Well, the patent doesn't teach the use of these 02:57:33
3 boards in LiDAR, but boards, as we know, are used in 02:57:39
4 LiDAR, so -- but it doesn't explicitly talk about LiDAR 02:57:43
5 It talks about printed circuit boards 02:57:46
6 Q And the portion of the -- or, I should say, the 02:57:48
7 German patent, it's not your opinion that it describes 02:57:53
8 [REDACTED] 02:57:56
9 [REDACTED] 02:57:59
10 A It's my understanding this patent doesn't discuss 02:58:00
11 [REDACTED] 02:58:04
12 Q Does it discuss [REDACTED] 02:58:09
13 A Just give me 30 seconds 02:58:12
14 I believe [REDACTED] are not mentioned in this patent 02:59:22
15 MR. NEWTON: Okay. Can we take a break real 02:59:24
16 quick? 02:59:26
17 THE VIDEOGRAPHER: Yeah. I've got to change the 02:59:27
18 disc, so -- 02:59:27
19 MR. NEWTON: Okay 02:59:27
20 THE VIDEOGRAPHER: -- that will work out 02:59:27
21 This is the end of Disc 1 in Volume 1 in the 02:59:29
22 deposition of Dr. Lebby. It is 2:59 02:59:31
23 (Recess taken) 02:59:35
24 THE VIDEOGRAPHER: We are back on the record 03:05:16
25 This is the beginning of Disc 2 in Volume 1 in 03:05:27

Page 73

19 (Pages 70 - 73)

| | |
|----------------------------------------------------------------------|----------------------------------------------------------------------|
| 1 the deposition of Dr. Lebby. It's 3:05. 03:05:31 | 1 LiDAR system; correct? 03:08:02 |
| 2 (Exhibit 37 was marked for 03:05:31 | 2 A I cited these references to show that industry 03:08:03 |
| 3 identification by the Court Reporter.) 03:05:33 | 3 technology is out there and in public that addresses 03:08:07 |
| 4 BY MR. NEWTON: 03:05:33 | 4 some of the trade secrets that I read in the Jaffe 03:08:12 |
| 5 Q Okay. Dr. Lebby, if you go to Exhibit No. 37, 03:05:34 | 5 Exhibit 1 document. 03:08:17 |
| 6 Deposition Exhibit No. 37, which is Exhibit No. 8 to 03:05:38 | 6 Q You did not cite them to show that Uber used 03:08:17 |
| 7 your declaration. 03:05:42 | 7 these references or these teachings to develop its 03:08:20 |
| 8 Do you recognize this as the '037 patent? 03:05:44 | 8 system; correct? 03:08:23 |
| 9 A Yes, I recognize it. 03:05:46 | 9 A These references were cited to show 03:08:24 |
| 10 Q And this is directed to a multilayer printed 03:05:47 | 10 state-of-the-art in technology of printed circuit boards 03:08:28 |
| 11 circuit board? 03:05:50 | 11 and -- and recent placement in alignment, things like 03:08:32 |
| 12 A That is correct. 03:05:51 | 12 [REDACTED] That -- that's the only reason I cited them. 03:08:35 |
| 13 Q And that's just a single printed circuit board, 03:05:51 | 13 Q Okay. So the answer to my question is "correct"? 03:08:39 |
| 14 not multiple printed circuit boards? 03:05:55 | 14 A I did not use these references to show anything 03:08:44 |
| 15 A I believe this is a single printed circuit board. 03:05:56 | 15 about Uber, just where the technology is in the -- from 03:08:47 |
| 16 Q And this is -- patent is not in the field of 03:06:01 | 16 an experienced engineer. 03:08:53 |
| 17 LiDAR; correct? 03:06:05 | 17 Q Okay. If you go to paragraph 59 of your 03:08:54 |
| 18 A The patent doesn't mention LiDAR at all. It just 03:06:05 | 18 declaration here, you discuss Trade Secret Nos. 94 to 03:08:58 |
| 19 talks about the process to drill holes into a printed 03:06:15 | 19 99? 03:09:08 |
| 20 circuit board and position hidden conductive layers. 03:06:18 | 20 A Yes, I see that. 03:09:08 |
| 21 Q Okay. And it doesn't talk about [REDACTED] 03:06:22 | 21 Q And these trade secret numbers refer to the PCB 03:09:12 |
| 22 [REDACTED] 03:06:25 | 22 design schematics and layouts for the transmit boards in 03:09:20 |
| 23 [REDACTED] correct? 03:06:29 | 23 Waymo's GBR3 LiDAR device? 03:09:24 |
| 24 A That's my understanding of this patent. Doesn't 03:06:30 | 24 A That is correct. 03:09:26 |
| 25 discuss [REDACTED] 03:06:33 | 25 Q And we talked earlier about your materials 03:09:27 |
| | Page 74 |
| | Page 76 |
| 1 [REDACTED] 03:06:37 | 1 considered. 03:09:29 |
| 2 [REDACTED] 03:06:41 | 2 You didn't consider these specific design files 03:09:29 |
| 3 but they are not directly called out in this patent. 03:06:44 | 3 as part of your declaration; correct? 03:09:31 |
| 4 Q And so we have looked at the Liu textbook, the 03:06:47 | 4 A I only considered what was shown to me in the 03:09:33 |
| 5 Scholz dissertation, the '109 patent, the German patent, 03:06:54 | 5 exhibits, and I think they were the Jaffe exhibits. 03:09:38 |
| 6 and the '037 patent, and you haven't cited any evidence 03:06:59 | 6 Q Okay. You didn't look at the native versions of 03:09:41 |
| 7 in your declaration that someone has actually taken the 03:07:04 | 7 the design files, for example? 03:09:45 |
| 8 teachings of these references and applied them to LiDAR; 03:07:07 | 8 A That is correct. 03:09:46 |
| 9 correct? And I'm just asking what you have cited in 03:07:13 | 9 Q And you didn't offer an opinion about whether 03:09:46 |
| 10 your declaration. 03:07:15 | 10 these files themselves are trade secrets; correct? 03:09:56 |
| 11 A Yeah, what I've cited in my declaration is 03:07:16 | 11 A I never looked. It wasn't part of my remit to 03:09:59 |
| 12 technologies that are common to myself as an experienced 03:07:20 | 12 look at native files, so I haven't offered any opinions. 03:10:04 |
| 13 person in the field where -- 03:07:24 | 13 Q And do you agree with me, generally, that, you 03:10:08 |
| 14 Q And, I'm sorry, Dr. Lebby, to cut you off, I'm 03:07:27 | 14 know, based on your experience that a company's design 03:10:12 |
| 15 just really under the clock here. 03:07:29 | 15 files can be trade secrets and include trade secret 03:10:15 |
| 16 I just -- if you can answer them "yes" or "no," 03:07:31 | 16 information? 03:10:19 |
| 17 you don't cite any evidence in your declaration of 03:07:33 | 17 A It depends. 03:10:19 |
| 18 someone taking these references and applying their 03:07:35 | 18 Also, from my experience with trade secrets is 03:10:24 |
| 19 teachings to LiDAR? 03:07:38 | 19 that you have got to have very clear specificity of your 03:10:27 |
| 20 A I have not observed any of these references 03:07:40 | 20 trade secret. I guess it could be in -- trade design 03:10:31 |
| 21 directly, either being taught or mentioned in LiDAR, but 03:07:44 | 21 files could be included in that. 03:10:35 |
| 22 the technologies within these references are certainly 03:07:49 | 22 Q And you understand, as part of this case, Waymo 03:10:36 |
| 23 something that could be used in LiDAR. 03:07:52 | 23 has alleged that Anthony Levandowski stole 14,000 files 03:10:42 |
| 24 Q Okay. And it's not your opinion that Uber took 03:07:53 | 24 related to Waymo's LiDAR systems? 03:10:47 |
| 25 these references and used them as a guide to develop its 03:07:57 | 25 A I have certainly read that in some of the 03:10:50 |
| | Page 75 |
| | Page 77 |